Draft Environmental Assessment

Posey Township Volunteer Fire Department

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SECTION 1: BACKGROUND

1.1 Project Authority

The Posey Township Volunteer Fire Department has applied for and been selected to receive a fiscal year (FY) 2009 American Recovery and Reinvestment Act (ARRA) Fire Station Construction Grant for construction of a new fire station #1. Assistance to Firefighters Fire Station Construction Grants (FSC) provide financial assistance directly to fire departments on a competitive basis to build new or modify existing fire stations in order for departments to enhance their response capability and protect the community they serve from fire and fire-related hazards. The authority and funding for the FSC is derived from the American Recovery and Reinvestment Act (ARRA) of 2009 (Public Law 111-5). Specifically, the purpose of this program is to focus on these goals, and the goals of the Assistance to Firefighters Grant (AFG) program, i.e. assisting fire departments in improving their basic response capability and capacity, and improving firefighter safety.

In accordance with the National Environmental Policy Act (NEPA) of 1969, the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 Code of Federal Regulations {CFR} Parts 1500 through 1508), and the Federal Emergency Management Agency (FEMA) regulations for NEPA compliance (44 CFR Part 10), FEMA must fully understand and consider the environmental consequences of actions proposed for federal funding. The purpose of this Environmental Assessment (EA) is to meet FEMA's responsibilities under NEPA and to determine whether to prepare a Finding of No Significant Impact (FONSI) or a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) for the proposed project.

1.2 Project Location

The Posey Township Volunteer Fire Department is in the Town of Staunton (population 548; July 1, 2008 Census estimate) rural community, located approximately 67.35 miles southwest of downtown Indianapolis, Indiana in Clay County, Posey Township, Indiana. Refer to Appendix A for corresponding Location Map. Per Census data estimates as of July 1, 2008, Clay County's population is 26,703 of which Posey Township comprises 3,964. This proposed project (503 East Columbus Street, Staunton, Indiana) will replace the current fire station facility located at 407 East Columbus Street, Staunton, Indiana and provide fire and basic life support (BLS) to Posey Township, Clay County and the adjoining communities. The existing facility at 407 East Columbus Street shall remain and be used as a training facility. Refer to Aerial Image; and Site Image in Appendix D.

Alternative 1- No Action: Continue to operate out of the existing facility. Alternative 2- Remodel Existing Facility located at 407 East Columbus Street and purchase an adjacent lot. Alternative 3- New Fire Station #1 (Proposed Action): construct new fire station on previously disturbed parcels totaling three consecutive lots on the northeast side of the intersection of Adams Street and East Columbus Street in Staunton, Indiana. The proposed site has been used for residential purposes and is surrounded by single family residential dwellings on three sides (east, south, and north) and tangentially on the fourth side (west). The geographical coordinates of the subject site are 39º 29' 16" North, 87º 11' 3" West.

1.3 Purpose and Need

Posey Township has identified the following deficiencies at the existing fire station located at 407 East Columbus Street:

(1) Disruption of Fire Service as a result of size limitations of the bay area (height, width and depth) prevent today's standard, off-the-line fire suppression vehicles from fitting in the bay slots; thereby causing excessive customization costs for vehicle purchase or limitations that cannot be overcome through customization.

(2) Health and Safety issues in the bay areas emanate from an inadequate perimeter around each vehicle which creates safety issues (two feet or less in the rear and 6 inches in the front for the pumper and tanker; while all vehicles have adjacent space of three and a half feet or less, these issues inhibit quick and easy personnel access to designated riding position on said vehicles. Health issues are created by the lack of exhaust removal equipment which cannot be installed because of a lack of adequate ceiling space.

(3) High Energy Operating Costs are diverting an ever increasing portion of the fire department's operating budget from the primary mission of the department. Just recently the local electricity provider has begun implementing an eighteen (18) percent rate increase which will eventually be followed by other increases. Given a one-hundred (100) years planning horizon, the fire department will be required to budget twenty (20) to twenty-five (25) percent of its operating budget for energy costs which can be materially reduced through the construction of a new fire station.

(4) Become compliant with National Fire Protection Association (NFPA) 1500 and International Code Council standards. Even though the fire department has not received a citation(s), this does not negate the non-compliance and need to provide a safe, healthy environment for the fire department members. The non-compliance affects the bay area and the administrative area (former church structure).

(5) Lack of quick, safe exit paths for fire and emergency department vehicles. Current facility lot siting requires an immediate 90º turn when the rear bumper clears the doorway.

In accordance with federal laws and FEMA regulations, the EA process for a proposed federal action must include an evaluation of alternatives and a discussion of the potential environmental impacts. This EA was prepared in accordance with FEMA's regulations as required under NEPA. As part of this NEPA review, the requirements of other environmental laws and executive orders are addressed.

1.4 Existing Facility

Posey Township is comprised of residential, agricultural, public schools, commercial and light industrial properties and is currently protected by one fire station, covering approximately 35.7 square miles. The Posey Township Volunteer Fire Department, located at 407 East Columbus Street, provides fire suppression and BLS services from a facility consisting of a bay area (one-way exit points) constructed of concrete block walls, wood/shingle roof and poured concrete floor constructed in 1958 for four emergency vehicles; while the adjoining administrative area is a former church comprised of brick walls, metal roof and poured concrete floor constructed in 1911. All firefighters and BLS personnel are volunteers. Refer to Historic Structure Images in Appendix D.

SECTION 2: ALTERNATIVE ANALYSIS

As a component of this environmental assessment, an analysis of alternatives to the proposed project will be conducted. For the purposes of this evaluation, three alternatives have been considered; no action; remodeling of existing facility; or construction of a new fire station.

2.1 Alternative 1- No Action

Under this alternative, the fire department would continue to run its operations out of the existing 50 plus year-old facility without alteration or changes. Given the serious deficiencies found in the review process, and the potentially negative impact on the fire personnel and the public; this alternative was not deemed optimal.

2.2 Alternative 2- Remodel Existing Station and Purchase Adjacent Lot

The second alternative explores the feasibility of renovating the existing fire station to comply with current standards and properly house the required apparatus and personnel assigned to the station. In considering this option, it is recognized that it would not resolve the health and safety issues (space constrictions), apparatus response issues, apparatus housing issues (space constrictions), high energy operating costs, compliance with standards, and safe, quick exit paths or fire and emergency vehicles without the purchase of an adjacent lot on the west side. Included in the second alternative would be

the purchase of the parcel on the west side of the existing parcel and the demolition of the existing residential structure on this parcel. Remodeling activities would expand the bay area by approximately 1,000 square feet and bring all other existing building components in compliance with NFPA, local, state and federal standards. As a result of the cumulative additional costs for the purchase of the land and demolition of existing structure, this alternative was not deemed optimal.

2.3 Alternative 3- New Fire Station # 1 (Proposed Alternative)

The third option explored the feasibility of constructing a new fire station on three lots adjacent to the present location. An analysis of current and prospective economic developments in Posey Township yielded an acceptable location at 503 East Columbus (fire department owned vacant lots) meets a balanced response time to all critical current and future economic activities. Close proximity to critical assets drove the site selection evidenced by an elementary school that is less than five minutes; a high school and middle school less than ten minutes (cumulatively the schools represent nearly 50% of the total county's student population); the town of Staunton residents less than five minutes; and with an eye toward the future, development of 3,000 acres of the former Amax coal properties which largely has transferred to private ownership and is anticipated to be comprised of light industrial, commercial and residential development activities. The proposed fire station has access to one U.S. Interstate (I-70), three State Roads (SR42, SR59 and SR46) and one U.S. Highway (US40).

The proposed project site location is a flat parcel, that slightly slopes (0 to 2%) west-northwest and consists of three consecutive town lots (126' 6" depth and 180' frontage or .522 acre), non-wetland, no stream(s) within the parcel or within a close proximity (aside from the partially open storm water drainage ditch which will be remedied during construction by installing drainage pipe covered by soil), non-floodplain, and non-agricultural land. The proposed project will be comprised of approximately 2,700 square feet (sq. ft.) for the bay area and 3,675 sq. ft. for the administration space derived from firefighter review of other fire stations and architect input; approximately 4,000 square feet of driveway; and a storm water retention system approximately eight (8) feet in diameter at a depth of 60-70 inches; collectively these elements comprise the major ground disturbance. Additional minor ground disturbance of a two inch wide by three foot depth trench for electric, telephone, cable; and a four inch wide by three foot depth trench for water and a six inch wide by three foot trench for sewage and lastly a four inch wide by three foot depth trench for natural gas. All aforementioned utilities are available at the construction site currently. The bay area will be a drive-thru design, incorporate exhaust removal system, fire suppression equipment storage, equipment repair work area, decontamination area, sprinkler/CO_2 and smoke detection with expansion capability while the administrative space will accommodate gender separate living quarters, restrooms and showers,

training, kitchen, dining, fitness area, back-up generator and storage etc. The building shall be designed in accordance with the State of Indiana building codes, federal regulations and local ordinances. Refer to Projected Footprint Image in Appendix D.

SECTION 3: AFFECTED ENVIRONMENT AND CONSEQUENCES

3.1 Physical Environment

3.1.1 Geology, Seismicity and Soils

Per the United States Geological Survey (USGS), the proposed site and adjoining area's elevation ranges from 350 to 1,000 feet with a mean annual precipitation of 40 to 46 inches; an annual mean air temperature of 52 to 55 degrees F and a frost-free period of 170 to 200 days. The elevation range reflects a gradually east to westward sloping topography. The township's most dominant physical feature is agricultural land and reclaimed land from mining activity in the central and southern parts of Posey Township with slightly sloping hills and numerous small bodies of water. The proposed site is flat and generally slopes from the eastern boundary downward up to 2% to the west-northwest boundary. Iva silt loam soil type makes up 99.8% of the proposed site which has the following characteristics:

Slope: 0 to 2 percent

Depth to restrictive feature: More than 80 inches

Drainage class: Somewhat poorly drained

Capacity of the most limiting layer to transmit water (K sat): Moderately low to moderately high (0.02 to 0.60 in/hr)

Depth to water table: About 6 to 24 inches

Available water capacity: High (about 10.2 inches)

Frequency of flooding: None

Frequency of ponding: None

Typical Iva silt loam profile is:

0 to 12 inches: Silt loam
12 to 34 inches: Silty clay loam
34 to 51 inches: Silt loam
51 to 60 inches: Silt loam

Refer to Soil Survey Report and Soil Map in Appendix A.

Clay County occupies a region along the lower Wabash River that lies within the Wabash Valley Fault System. Clay County is threatened mostly by the New Madrid Fault System and the Lower Wabash Valley Fault System. Return periods for large earthquakes within the New Madrid System are estimated to be 500 years: moderate quakes between magnitude 5.5 and 6.0 can recur within approximately 150 years or less. The Wabash Valley Fault System is a sleeper that threatens the southwest quadrant of the state and may generate an earthquake large enough to cause damage as far north and east as Indianapolis (source: Clay County Hazard Mitigation Plan 2009). USGS seismicity map of Indiana indicates two earthquakes had epicenters in Clay County, a 4.0 magnitude in July 1984 and a 3.2 magnitude in August 1984, (USGS-Indiana). Accordingly, architectural design of the foundation and framework structure for this critical infrastructure project would meet earthquake mitigation standards. Refer to Historical Clay County Earthquake Epicenters Map (source: Clay County Hazard Mitigation Plan 2009) in Appendix A.

The Farmland Protection Policy Act (FPPA) (Public Law [P.L.] 97-98, Section 1539-1549;7 United States Code [U.S.C.] 4201, et seq.) was enacted in 1981 (P.L. 98-98) to minimize the unnecessary conversion of farmland to non-agricultural uses as a result of federal actions. Programs administered by federal agencies must be compatible with state and local farmland protection policies and programs. The Natural Resources Conservation Service (NRCS) is responsible for protecting significant agricultural lands from irreversible conversions that result in the loss of an essential food or environmental source. Prime farmland is characterized as land with the best physical and chemical characteristics for the production of food, feed, forage, fiber, and oilseed crops (United States Department of Agriculture [USDA], 1989). This land is either used for food or fiber crops or is available for those crops, but is not urban, built-up land, or water areas.

The proposed construction site lies within a previously disturbed residential area; therefore, does not meet the farmland requirements set under the FPPA; thus not applicable. Refer to Natural Resource Conservation Service- Agency Correspondence in Appendix C.

Alternative 1- No Action: Under this alternative, no impacts to the geology or soils of the existing site would occur.

Alternative 2- Remodel Existing Facility and Purchase Adjacent Lot: Under this alternative, potential remodeling construction activities would be limited to the additional 1,000 square foot expansion of the bay area, thus would not be deep enough to impact underlying geological resources. Disturbance depths would range from 8-36 inches for demolition activities; 24-36 inch depth for foundation; 8-10

inch depth for concrete pad floor; 60-70 inch depth in an eight foot diameter for a rain garden and lastly 60-66 inch depth and 24 inch wide trench for geothermal if architect deems cost effective against other energy alternatives. Short-term impacts to soils may occur during construction activities related to construction vehicle loading and traffic. Appropriate soil erosion best management practices such as silt fence, inlet filters and mud tracking mats and restoration work would be implemented to minimize storm water runoff.

Alternative 3- New Fire Station # 1 (Proposed Action): Under this proposed alternative, construction activities would not be deep enough to impact underlying geological resources. Disturbance depths would range from 8-10 inches for driveways; 24-36 inches for foundation; 8-10 inches for concrete pad floors; 60-70 inches in an eight foot diameter for a rain garden; and lastly 60-66 inch depth and 24 inch wide trench for geothermal if architect deems cost effective against other energy alternatives. The potential project footprint is anticipated to be no more than 6,375 square feet with driveways that would be no more than a 4,000 square feet footprint. Architectural design for this critical infrastructure facility will incorporate earthquake mitigation standards. Appropriate soil erosion best management practices (BPM's) such as silt fences, inlet filters and mud tracking mats and restoration work would be implemented to minimize storm water runoff. Any stockpiles of topsoil or clean fill material will be surrounded by silt fence and covered as conditions dictate to prevent fugitive dust and soil erosion. See Concept Footprint Image in Appendix D.

3.1.2 Water Resources and Water Quality

The Clean Water Act (CWA), as amended in 1977, established the basic framework for regulating discharges of pollutants into waters of the United States.

An existing site topography map is shown in Appendix A. The project site is approximately .522 acres and is currently vacant residential lots (three consecutive lots). Proposed parking areas and walkways shall incorporate "green" porous design to minimize environmental impact and facilitate natural water flows and minimize any potential storm water runoff. Water main, sanitary, electric and natural gas and cable connections shall occur across the East Columbus Street frontage (all utilities available at the site). The construction site will not increase storm water runoff; rather, through landscaping design and the installation of a storm water drain connecting to the town's system, storm water runoff shall be reduced and eliminate current storm flooding of a home.

Alternative 1- No Action: Under this alternative, no impacts to the surface water of the existing site would occur.

Alternative 2- Remodel Existing Facility and Purchase Adjacent Lot: Under this alternative and as previously noted, potential remodeling construction activities would be mostly limited to the existing building footprint; however, some increased potential for storm water runoff would occur. To lessen this potential increase in storm water runoff the following mitigating practices would be implemented: landscape contouring, and rain garden installation. In addition, temporary soil erosion control measures shall be installed and maintained throughout remodeling construction phases to prevent soil erosion into existing surface runoff.

Alternative 3- New Fire Station # 1 (Proposed Action): Under this alternative, construction activities would increase the amount of impervious land within the proposed construction site; therefore, increasing the potential for storm water runoff. However, this potential increase in runoff shall be mitigated by the construction of landscaping contours, rain garden installation and installation of storm water drainage that connects to the town's system which has capacity currently and will be expanded during the summer of 2010. The town of Staunton's storm water drainage is a series of open ditches and sections of ground covered drainage pipe. Current state storm water drainage from the construction site natural flows to two open ditches. In addition, temporary soil erosion control measures shall be installed and maintained throughout construction phases to prevent soil erosion into existing surface runoff.

3.1.3 Floodplain Management (Executive Order 11988)

Executive Order (EO) 11988 requires federal agencies to take action to minimize occupancy and modification of a floodplain. Specifically, EO 1198 prohibits federal agencies from funding construction in the 100-year floodplain unless there are no practicable alternatives. FEMA's regulations for complying with EO 11988 are promulgated in 44 CFR Part 9.

This proposed project does not lie within the 100-year floodplain or 500-year floodplain as indicated in the FEMA Flood Insurance Rate Map, Community Panel Number 180408 003 A, located in Appendix A and DNR-Division of Water Agency Correspondence in Appendix C.

Alternative 1- No Action: The existing fire station does not lie within the 100-year or 500-year floodplain; therefore, no impact to the floodplain.

Alternative 2- Remodel Existing Facility and Purchase Adjacent Lot: The existing fire station and adjacent lot do not lie within the 100-year or 500-year floodplain; therefore, no impact to the floodplain.

Alternative 3- New Fire Station # 1 (Proposed Action): The proposed site does not lie within a 100-year or 500-year floodplain; therefore, no impact to the floodplain.

3.1.4 Air Quality

The Clean Air Act requires the U.S. Environmental Protection Agency (EPA) to set National Ambient Air Quality Standards (NAAQS) for pollutants considered harmful to public health and the environment; the Clean Air Act established two types of national air quality standards; primary standards set limits to protect public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly; secondary standards set limits to protect public welfare, including protection against decreased visibility, damage to animals, crops, vegetation, and buildings; current criteria pollutants are : Carbon Monoxide (CO), Nitrogen Dioxide (NO_2), Ozone (O_3), Lead (Pb), Particulate Matter (PM_{10}), and Sulfur Dioxide (SO_2). As of 2009, data for Clay County is not available; however, in the adjacent county, Vigo, the following pollutants are measured: O_3, SO_2, PM2.5, and Pb. All air quality monitoring in Vigo County meets the minimum federal and state of Indiana requirements (Indiana Department of Environmental Management).

Alternative 1- No Action: Under this alternative, there would be no impacts to air quality because no construction would occur.

Alternative 2- Remodel Existing Facility and Purchase Adjacent Lot: Under this alternative and as previously noted, potential remodeling construction activities would be largely limited to the existing footprint; however, remodeling construction activities would create short-term impacts to air quality in and around the site. These would be mitigated by wetting down areas of disturbance to limit fugitive dust. In addition, emissions from fuel-burning engines could also temporarily increase the levels of some criteria pollutants, are CO_2, NO_2, O_3, PM_{10} and some non-criteria pollutants such as volatile organic compounds (VOCs). To mitigate all of these emissions, fuel-burning equipment run times will be kept to a minimum and equipment would be properly maintained.

Alternative 3- New Fire Station # 1 (Proposed Action): Under this proposed alternative, construction activities would create short-term impacts to air quality in and around the site. These would be

mitigated by wetting down areas of disturbance to limit fugitive dust. In addition, emissions from fuel-burning engines could also temporarily increase the levels of some criteria pollutants, are CO_2, NO_2, O_3, PM_{10} and some non-criteria pollutants such as volatile organic compounds (VOCs). To mitigate all of these emissions, fuel-burning equipment run times shall be kept to a minimum through planning; operator practices and equipment shall be properly maintained. No permits for maintaining air quality are required.

3.2 Biological Environment

3.2.1 Terrestrial and Aquatic Environment

The proposed construction site is a residential setting located in the south-central quadrant of Posey Township. According to the Clay County Historical Society and Museum records, the site and surrounding lands have been residential since 1851. All areas surrounding the proposed site are single family residential dwellings. Homes generally have been constructed within the last 5 to 40 years. Given the residential setting, the proposed construction site supports wildlife common to a residential setting including but not limited to: insects, song birds, small mammals, reptiles and amphibians. Because the site is small in scale (.522 acre) and residential setting, it would have limited value for plant and wildlife species.

The Department of Natural Resources (DNR) website for Endangered Species Assessment was utilized to determine if there are any known or listed endangered, threatened, or special concern species, high quality natural communities, or other unique natural features known to occur at or near the proposed construction site. Upon entering the site location data, the Indiana DNR assessment of endangered, threatened and rare species list for Clay County, Indiana indicated that none of those features were present at the subject site. As such, there are no potential impacts to terrestrial and aquatic environments. Refer to DNR-Division of Water and U.S. Department of Interior Fish and Wildlife Service Agency Correspondence in Appendix C.

Alternative 1- No Action: Under this alternative, there would be no impacts to the terrestrial and aquatic environment because no construction would occur.

Alternative 2- Remodel Existing Facility and Purchase Adjacent Lot: Under this alternative and as previously noted, potential construction activities would be largely limited to the existing building footprint; however, based on the DNR, U.S. Department of Interior-Fish and Wildlife, and Indiana

Department of Environmental Management assessments, the remodeling construction activities would not have any impacts on the existing terrestrial and aquatic environments.

Alternative 3- New Fire Station # 1 (Proposed Action): Under this proposed alternative, and based on the DNR, U.S. Department of Interior-Fish and Wildlife, and Indiana Department of Environmental Management assessments, the construction of a new Fire Station # 1 would not have any impacts on the existing terrestrial or aquatic environments. See Agency Correspondence in Appendix C.

3.2.2. Wetlands (Executive Order 11990)

The United States Army Corps of Engineers (USACE) regulates the discharge of dredged or filled material into waters of the U.S., including wetlands, pursuant to Section 404 of the CWA. Additionally, EO 11990 (Protection of Wetlands) requires Federal agencies to avoid, to the extent possible, adverse impacts on wetlands that may result from federally funded actions. Regulated wetlands in Indiana are also protected by the Indiana Department of Environmental Management.

No wetlands or surface waters have been identified on-site or adjacent to it. In addition to a site visit by Reed Consulting, the United States Fish and Wildlife Service National Wetland Inventory (NWI) wetland maps were reviewed, yielding no wetlands identified on the proposed construction site. The nearest water body is over 1,000 feet to the northeast of the proposed site. Refer to NWI Wetland Mapper Map in Appendix A.

Alternative 1- No Action: Under this alternative, there would be no impacts to existing wetlands because no construction would occur.

Alternative 2- Remodel Existing Facility and Purchase Adjacent Lot: Under this alternative and as previously noted, potential remodeling construction activities would be largely limited to the existing building footprint, thus no impacts to any existing wetlands would occur because none are present on or near the proposed remodeling project site. Wetlands closest to the proposed site are several miles away from the proposed remodeling construction project site, thus would not directly or indirectly impact any wetlands during the construction. Appropriate BMPs would be required at the construction site, including, but not limited to: the installation of silt fences and revegetation of bare soils to minimize erosion.

Alternative 3- New Fire Station # 1 (Proposed Action): Under this proposed alternative, no impacts to the waters of the U.S., including wetlands, would occur because none are present on or near the

proposed project site. Wetlands closest to the proposed site are several miles away from the proposed construction project site, thus would not directly or indirectly impact any wetlands during the construction. Appropriate BMPs would be required at the construction site, including, but not limited to: the installation of silt fences and revegetation of bare soils to minimize erosion.

3.2.3 Threatened and Endangered Species

The proposed construction site is a residential setting located in the south-central quadrant of the Posey Township. According to area residents and the Clay County Historical Society and Museum, the site and surrounding lands have been residential since 1851. All areas surrounding the proposed site are single family residential dwellings. Homes generally have been constructed within the last 5 to 40 years. Given the residential setting, the proposed site supports wildlife common to residential setting including but not limited to: insects, song birds, small mammals, reptiles and amphibians. Because the site is small in scale (.522 acre), it would have limited value for plant and wildlife species.

In accordance with Section 7 of the Endangered Species Act (ESA) of 2973, the project area was evaluated for the potential occurrences of federally listed threatened and endangered species. The ESA requires any federal agency that funds, authorize or carries out an action to ensure that their action is not likely to jeopardize the continued existence of any endangered or threatened species (including plant species) or result in the destruction or adverse modification of designated critical habitats (FEMA 1996).

In compliance with Section 7 of the Endangered Species Act, a review of the potential impacts to federally listed endangered, threatened and candidate species has been completed. According to the U.S. Fish and Wildlife technical assistance website of Region 3, the following federally listed species are known to occur in Clay County, Indiana: Indiana Bat. The Indiana Department of Natural Resources State listed Endangered, Threatened and Rare Species known to occur in Clay County include: Upland Sandpiper, Red-shouldered Hawk, Loggerhead Shrike, Kirtland's Snake, Timber Rattlesnake, Copperbelly Water Snake, Ornate Box Turtle, Western Ribbon Snake, Eastern Sand Darter, Blue Sucker, Northern River Otter, Bobcat, Indiana bat, Evening Bat, American Badger, and Atlantic Sedge.

In addition, in conformance with Section 7 of the Endangered Species Act, FEMA has conducted a review of potential impacts to federally listed threatened, endangered and candidate species. Upon applying the aforementioned federal agency standards, no impacts were found based on the proposed

project site. Refer to DNR-Division of Water and U.S. Department of Interior Fish and Wildlife Service Agency Correspondence in Appendix C.

Alternative 1- No Action: Under this alternative, there would be no impacts to any existing threatened or endangered species because no construction would occur.

Alternative 2- Remodel Existing Facility and Purchase Adjacent Lot: Under this alternative and as previously noted, construction activities would be largely limited to the existing building footprint. The adjacent lot is currently residential with limited value for plant and wildlife species. No impacts to any existing federal or state listed threatened or endangered species or critical habitat are anticipated.

Alternative 3- New Fire Station # 1 (Proposed Action): Under this proposed alternative, two storm damaged trees will be removed and replaced with the DNR-Division of Water prescribed number of trees, (10) that are at least two (2) inch in diameter at breast height. No alterations will be made in existing floodplain areas or watercourses. The proposed project area is currently vacant residential lots (three consecutive) with limited value for plant and wildlife species. No impacts to existing federal or state listed endangered species or critical habitat are anticipated.

3.3 Hazardous Materials

A Phase 1 environmental site assessment of the proposed property was performed in March 2009 by Matthew Reed of Reed Consulting. A visual inspection (e.g. vent pipes, fill pipes, etc.) yielded no presence of hazardous materials or underground storage tanks (USTs) or above ground storage tanks (ASTs). Also, the Indiana Department of Environmental Management does not identify any registered storage tanks within the proposed construction site. Further investigation with residents and local officials did not reveal any installation or removal of storage tanks within the proposed construction site.

No apparent visual indications of the presence of containers with hazardous materials or petroleum products that might represent a risk were observed on the proposed construction site. No apparent olfactory indications of the presence of strong, pungent, or noxious odors were observed within the proposed construction site. No apparent pools of liquid were observed on the proposed construction site. No apparent visual indications of the presence of drums or containers on the proposed construction site that likely contain hazardous substances or petroleum products were observed. No

apparent visual indications of the presence of open or damaged containers containing unidentified substances suspected of being hazardous substances or petroleum products were observed on the proposed construction site.

During the visual survey, the proposed construction site was surveyed for the presence of liquid-cooled electrical units (e.g., transformers, ballasts, etc). Such units are of possible concern because they may contain polychlorinated biphenyls (PCB) sources. PCB units may subject the owner/operator to various regulatory requirements under the Toxic Substance Control Act (TSCA). The release of PCB fluids or their combustion products (in the case of spill or fire) are potential environmental liabilities and may require remedial actions. No electrical transformers were observed to be associated with the proposed construction site. In addition, no suspect hydraulic equipment was observed on the proposed construction site.

No apparent visual indications of the presence of areas, mounds, or depressions that may be filled or graded by non-natural causes or filled with fill of unknown origin suggesting trash or other solid waste disposal were observed on the proposed construction site. In addition, based on a review of EPA waste disposal sites, the proposed construction site is not located at or within the vicinity of a historic solid waste disposal facility.

This assessment revealed no evidence of recognized hazardous material conditions in connection with the proposed construction site. Also, refer to Indiana State Department of Health Agency Correspondence in Appendix C.

Alternative 1- No Action: Under this alternative, there would be no impacts from hazardous materials because no construction would occur.
Alternative 2- Remodel Existing Facility and Purchase Adjacent Lot: Under this alternative, there would be no impact from hazardous materials because none are known to be present on the proposed remodeling construction site. If hazardous waste is discovered during construction on the proposed site, waste will be disposed of in accordance with all applicable federal, state and local laws.

Alternative 3- New Fire Station # 1 (Proposed Action): Under this alternative, there would be no impact from hazardous materials because none are known to be present on the proposed construction site. If hazardous waste is discovered during construction on the proposed site, waste will be disposed of in accordance with all applicable federal, state and local laws.

3.4 Socioeconomics

3.4.1 Zoning and Land Use

The proposed construction site is located in the south-central portion of Posey Township, within the town limits of Staunton and across the street from the present Posey Township Volunteer Fire Department. No zoning laws or ordinances applicable to this construction project exist within the town of Staunton or Clay County. Even though laws and ordinances do not exist, the project shall abide by typical zoning requirements such as set-backs, safe egress/ingress, blend with existing architectural structures etc.

Alternative 1- No Action: Under this alternative, there would be no impacts to existing land use or zoning because no construction would occur.

Alternative 2- Remodel Existing Facility and Purchase Adjacent Lot: under this alternative, there would be no zoning or land use impact since laws or ordinances do not exist. Even though laws and ordinances do not exist, the project shall abide by typical zoning requirements such as set-backs, safe egress/ingress, blend with existing architectural structures etc.

Alternative 3- New Fire Station # 1 (Proposed Action): Under this proposed alternative, there would be no zoning or land use impact since laws or ordinances do not exist. Even though laws and ordinances do not exist, the project shall abide by typical zoning requirements such as set-backs, safe egress/ingress, blend with existing architectural structures etc.

3.4.2 Visual Resources

The proposed construction site is a residential setting in the south-central portion of Posey Township. According to the Clay County Historical Society and Museum, the site and surrounding lands have been residential since 1851. All areas surrounding the proposed site are single family residential dwellings. Homes generally have been constructed within the last 5 to 40 years. Standing in the middle of the proposed construction site, one views single family dwellings on the south, east and north sides directly with tangential residences on the western side. Accordingly, Reed Consulting spoke directly with every adjacent homeowner in October 2009, informing them of the proposed project and the direct incorporation of them through public meetings, personally provided architectural design sessions and personally showing design development drawings for those who do not attend public meetings. We are very sensitive to the close proximity of homes and will create a design

solution that balances all parties concerns and desires. Refer to Site Images and Historic Structure Images in Appendix D.

Alternative 1- No Action: Under this alternative, there would be no impacts to the visual resources of the existing station because no construction would occur.

Alternative 2- Remodel Existing Facility and Purchase Adjacent Lot: Under this alternative and as previously noted, potential remodeling construction activities would be largely limited to the existing building footprint; therefore, there would be minor impacts to the existing visual resources surrounding the existing fire station. Architectural design shall be charged with blending the new fire station # 1 with the surrounding neighborhood.

Alternative 3- New Fire Station # 1 (Proposed Action) Under this alternative, the construction of the proposed Station # 1 would become a new obstruction to the existing visual resources of the site and surrounding properties. Architectural design shall be charged with blending the new fire station # 1 with the surrounding neighborhood.

3.4.3 Noise

Noise can be considered unwanted sound and sound is typically measured in decibels (dB). An average measure of sound is known as the day-night average sound level (Ldn), and is used by agencies foe estimating sound impacts and establishing guidelines for compatible land uses. An EPA document, Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety (EPA, 1974) provides a basis for State and local government's judgments in setting standards. The document identifies a 24-hour exposure level of 70 dB, as long as a sufficient amount of relative quiet is experienced.

The sound level of a typical sound outdoors falls off in level at 6 dB per doubling of distance. In the case of a siren, the noise would be 115 dB at a distance of 10 feet from the source, 109 dB 20 feet, 103 dB at 40feet, 97 dB at 80 feet, 91 dB at 160 feet, 85 dB at 320 feet, 79 dB at 640 feet, 73 dB at 1,280 feet, 67 dB at 2,560 feet and approximately 60 dB at a distance of one mile. The proposed construction site is at the corner of Adams Street and East Columbus Street in Staunton, Indiana, with residential single family dwellings on and around all sides. These neighbors would be impacted by the construction activities. Emergency vehicle siren activities will not change the current conditions noise levels since the proposed construction site is across the street to the existing facility.

Alternative 1- No Action: Under this alternative, there would be no noise because no construction would occur.

Alternative 2- Remodel Existing Facility and Purchase Adjacent Lot: Under this alternative, only temporary short-term increases in noise levels would be anticipated during remodeling construction. To reduce noise levels during that period, remodeling construction activities would be restricted to normal daylight business hours. Equipment and machinery used at the proposed construction site would meet all local, state and federal noise regulations.

Alternative 3- New Fire Station # 1 (Proposed Action): Under this alternative, only temporary short-term increases in noise levels would be anticipated during construction. To reduce noise levels during that period, construction activities would be restricted to normal daylight business hours. Equipment and machinery used at the proposed construction site would meet all local, state and federal noise regulations.

Over the long-term, residents shall not experience a change in noise levels from what they currently experience. At a minimum, no changes in noise levels are anticipated because the existing fire station is across the street from the proposed project site. In fact through potential architectural design of noise barriers and planting of trees, it is anticipated that noise levels will be reduced and further positively impacted by fire/emergency vehicles running inside the bay area for their respective periodic functional tests, as opposed to current practices taking place outside.

3.4.4 Public Services and Utilities

Public services available to the proposed .522 acre site include: water & sewage; electricity; gas; telephone; and cable. The site is within the Clay Community School district (Staunton Elementary; North Clay Middle School; Northview High School), and the town marshal of Staunton. The proposed project shall benefit Posey Township, Clay County and the surrounding communities through improved response times, improved fire fighter safety, ensure no disruption of service and reduce fire station energy operating costs.

Alternative 1- No Action: Under this alternative, there would be no impact to existing public services and utilities because no construction activity would occur.

Alternative 2- Remodel Existing Facility and Purchase Adjacent Lot: Under this alternative and as previously noted, potential remodeling construction activities would require the use of virtually all available, cited above, public services and utilities. In fact, all are available currently with no connection issues anticipated.

Alternative 3- New Fire Station # 1 (Proposed Action): Under this proposed alternative, the construction of Fire Station # 1 would require the use of virtually all available, cited above, public services and utilities. In fact, all are available currently with no connection issues anticipated.

3.4.5 Traffic Circulation

The existing public roads adjacent to the proposed construction site include East Columbus Street (frontage); Adams Street (west side) and an alley (north side). All said roads are under the jurisdiction of the town of Staunton and the Indiana Department of Transportation. All roads are two lanes, asphalt, while the alley is gravel. All construction traffic shall enter East Columbus Street and partially Adams Street and exit same said streets. Mud mats will be installed at these access points to limit tracking of mud and debris onto East Columbus and Adams Streets. No public transportation exists in the town of Staunton.

Alternative 1- No Action: Under this alternative, there would be no impacts to existing traffic and circulation because no construction would occur.

Alternative 2- Remodel Existing Facility and Purchase Adjacent Lot: Under this alterative, the remodeling construction activities of Fire Station # 1 would create very short-term traffic and circulation impacts related to construction traffic coming to and from the site. However, given the town of Staunton's small population (548), minimal traffic occurs in normal circumstances; therefore, no intermediate or long-terms impacts would be realized.

Alternative 3- New Fire Station # 1: Under this proposed alternative, the construction activities of Fire Station # 1 would create very short-term traffic and circulation impacts related to construction traffic coming to and from the site. However, given the town of Staunton's small population (548), minimal traffic occurs in normal circumstances; therefore, no intermediate or long-terms impacts would be realized.

3.4.6 Environmental Justice (Executive Order 12898)

On February 11, 1994, President Clinton signed Executive Order (EO) 12898, entitled, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations". The EO directs federal agencies, "to make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States…" Socioeconomic and demographic data for the project area were analyzed via the 2000 Census data to determine if a disproportionate number of minority or low-income persons have the potential to be adversely affected by the proposed project.

2000 Census data for Posey Township indicates that the population demographics are: 98.7% White; 0.1% Black; 0.1% Asia and 0.6% Other and 0.6% of two or more races. No concentrations of minority or low-income populations were identified near the proposed site.

Alternative 1- No Action: Under this alternative, there would be no disproportionally high and adverse impacts on minority or low-income populations because no construction would occur.

Alternative 2- Remodel Existing Facility and Purchase Adjacent Lot: Under this alternative, there would be no disproportionally high and adverse impacts on minority or low-income populations. Purchasing the adjacent lot and remodeling the existing fire station will increase fire response; lower operating costs; provide an environment that is safe and healthy; and facilitate safe, quick egress/ingress for fire/emergency vehicles, equipment and personnel which benefits all citizens in Posey Township, Clay County and the adjoining communities.

Alternative 3- New Fire Station # 1 (Proposed Action): Under this proposed alternative, there would be no disproportionately high and adverse impacts on minority or low-income populations. Construction of a new fire station will increase fire response; lower operating costs; provide an environment that is safe and healthy; and facilitate safe, quick egress/ingress for fire/emergency vehicles, equipment and personnel which benefits all citizens in Posey Township, Clay County and the adjoining communities.

3.4.7 Safety and Security

To minimize risks to safety and human health, all construction activities would be performed using qualified personnel trained in the proper use of the appropriate equipment including all appropriate safety precautions; additionally, all activities would be conducted in a safe manner in accordance with the standards specified in Occupational Safety and Health Act (OSHA) regulations. EO 13045, Protection of Children, requires federal agencies to make it a high priority to identify and assess environment health and safety risks that may disproportionately affect children.

Alternative 1- No Action: Under this alternative, there would be no construction on the proposed site and therefore no risk to the safety and security of Posey Township's population.

Alternative 2- Remodel Existing Facility and Purchase Adjacent Lot: Under this alternative, the purchase of an adjacent lot and remodeling of the existing fire station would increase Posey Township's fire protection and directly increase the safety and security of Posey Township's population. Remodeling construction activities could present safety risks to those performing the activities. Access to the site will be restricted to authorized personnel only, thus protecting the general public and minimize risks to safety and human health. Appropriate signage and barriers would be in place prior to construction activities to alert pedestrians and motorists of project activities. There would be no disproportionate health and safety risks to children.

Alternative 3- New Fire Station # 1 (Proposed Action): Under this proposed alternative, the construction of a new fire station would increase Posey Township's fire protection and directly increase the safety and security of Posey Township's population. Construction activities could present safety risks to those performing the activities. Access to the site will be restricted to authorized personnel only, thus protecting the general public and minimize risks to safety and human health. Appropriate signage and barriers would be in place prior to construction activities to alert pedestrians and motorists of project activities. There would be no disproportionate health and safety risks to children.

3.5 Historic and Cultural Resources

In addition to review under NEPA, consideration of effects to historic properties is mandated under Section 106 of the National Historic Preservation Act (NHPA), as amended, and implemented by 36 CFR Part 800. Requirements include identification of significant historic properties that may be

affected by the Proposed Action. Historic properties are defined as archaeological sites, standing structures, or other historic resources listed in or eligible for listing in the National Register of Historic Places (NRHP) (36 CFR 60.4).

As defined in 36 CFR Part 800.16(d), the Area of Potential Effect (APE), "is the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if such properties exist."

In addition to identifying historic properties that may exist in the proposed project's APE, FEMA must also determine, in consultation with the appropriate State Historic Preservation Officer (SHPO)/Tribal Historic Preservation Officer (THPO), what effect, if any, the proposed construction activities will have on historic properties. Moreover, if the project would have an adverse effect on these properties, FEMA must consult with SHPO/THPO on ways to avoid, minimize, or mitigate the adverse effect. During construction, ground disturbing activities would be monitored. Should human skeletal remains or historic or archaeological materials be discovered during construction, all ground disturbing activities on the proposed construction site would cease and the coroner's office (in the case of human remains). FEMA and the Indiana State Historic Preservation Office would be notified immediately. Refer to SHPO and FEMA Agency Correspondence in Appendix C.
Alternative 1- No Action: Under this alternative, there would be no construction on site; therefore, no impacts to historic or cultural resources.

Alternative 2- Remodel Existing Facility and Purchase Adjacent Lot: Under this alternative, the purchase of an adjacent lot and remodeling of the existing fire station would not impact to historic or cultural resources. Requirements shall be made of the architect to incorporate the appropriate design to blend into the residential neighborhood. Note that the only structure within the APE that meets the criteria is the existing fire department facility which was deemed to not be an historic structure. Refer to a copy of the Indiana SHPO and FEMA Agency Correspondence in Appendix C.

Alternative 3- New Fire Station # 1 (Proposed Action): Under this proposed alternative, the construction of a new fire station # 1 would not impact historic or cultural resources. Requirements shall be made of the architect to incorporate the appropriate design to blend into the residential neighborhood. Note that the only structure within the APE that meets the criteria is the existing fire department facility which will not undergo any changes and is not a part of the proposed construction project. Evaluation of the Proposed Action is described in Sections 3.5.1 and 3.5.2.

3.5.1 Historic Structures and Archaeological Resources

On May 4, 2009, a letter and supporting documentation was submitted to the Indiana SHPO with a request for SHPO comment and consultation on a federal undertaking. The request included documentation gathered by Reed Consulting on historic properties in the area of the proposed construction site. The Indiana State Historic Preservation Office responded to the request on June 9, 2009. The response stated that it is the opinion of the Indiana State Historic Preservation Officer that no historic properties are affected within the area of potential effects of this undertaking. An update with a FEMA determination was sent to the SHPO on March 2, 2010. THE SHPO responded in a letter dated March 22, 2010 with a concurrence to the FEMA determination letter. Refer to a copy of the Indiana SHPO and FEMA Agency Correspondence in Appendix C.

3.5.2 Tribal Coordination and Religious Sites

On November 6, 2000, President Clinton signed Executive Order (EO) 13175, entitled, "Consultation and Coordination with Indian Tribal Governments". The EO directs federal agencies, "to establish regular and meaningful consultation and collaboration with tribal officials in the development of Federal policies that have tribal implications, to strengthen the United States government-to-government relationships with Indian tribes, and to reduce the imposition of unfunded mandates upon Indian tribes..."

Requests for evaluation of the presence or absence of known archaeological and Indian Religious sites within the proposed project areas were by FEMA on March 2 and 5, 2010 to recognized Tribes that may have an interest in projects located in Clay County, Posey Township. Those tribes include: Peoria Tribe of Indians of Oklahoma; Delaware Nation; Stockbridge-Munsee Community Band of Mohican Indians; and the Miami Tribe of Oklahoma. Refer to Tribal Letters and Correspondence in Appendix C.

3.6 Comparison of Alternatives

The following table summarizes the impacts and mitigation of Alternative 1, 2 and 3.

Affected Environment	Impacts	Mitigation
Geology & Soils	Alt 1: No Impact	N/A
	Alt 2: No Impact to geology; short-term to soils during remodeling construction. Approx. 1,000 sq.ft.	Applicable soil erosion BMPs; silt fence. quick establishment of vegetation.
	Alt 3: No impact to geology; short-term to soils during construction. Approx. 6,375 sq.ft. ft. structure and 4,000 sq.ft. of site.	Applicable soil erosion BMPs; silt fence. quick establishment of vegetation.
Water Quality (including surface and groundwater)	Alt 1: No Impact	N/A
	Alt 2: Short-term impacts to surface are possible during remodeling construction. No impact to water resources. Site has public water and sanitary.	None
	Alt 3: Short-term impacts to surface are possible during construction. No impact to water resources. Site has public water and sanitary.	None

Affected Environment	Impacts	Mitigation
Floodplain	Alt 1: No Impact; Not in 100-year or 500-year floodplain.	None
	Alt 2: No Impact; Not in 100-year or 500-year floodplain.	None
	Alt 3: No Impact; Not in 100-year or 500-year floodplain.	None
Air Quality	Alt 1: No Impact	None
	Alt 2: Short-term impacts from remodeling dust and equipment emissions during construction.	Water down disturbed area of site. Keep fuels burning equipment use to a minimum.
	Alt 3: Short-term impacts from construction dust and equipment emissions during construction.	Water down disturbed area of site. Keep fuels burning equipment use to a minimum.
Terrestrial and Aquatic Environments	Alt 1: No Impact	None
	Alt 2: No Impact	None
	Alt 3: No Impact	None
Waters of the U.S. including wetlands	Alt 1: No Impact	None
	Alt 2: No Impact	None
	Alt 3: no Impact	None
Threatened and Endangered Species	Alt 1: No Impact	None
	Alt 2: No Impact	None
	Alt 3: No Impact	None

Affected Environments	Impacts	Mitigation
Hazardous Materials	Alt 1: No Impact	None
	Alt 2: No Impact anticipated from hazardous materials and no contaminants released to the environment	None
	Alt 3: No impacts anticipated. No hazardous materials are anticipated and no release of contaminants to the environment	Any hazardous materials discovered during construction must be disposed of in accordance with federal, state, and local laws
Zoning, Land Use and Transportation	Alt 1: No Impact	None
	Alt 2: No zoning or ordinances; some remodeling construction traffic, with no increase to log-term increase to traffic.	All remodeling construction vehicles will be stored on site with applicable construction signage.
	Alt 3: No zoning or ordinances; some construction traffic, with no increase to log-term increase to traffic.	All construction vehicles will be stored on site with applicable construction signage.
Noise	Alt 1: No Impact	None
	Alt 2: Short-term impact during construction. No long-term impact.	Remodeling construction would be limited to day light business hours.
	Alt 3: Short-term impact during construction. No long-term.	Construction would be limited to day light business hours.

Affected Environments	Impacts	Mitigation
Public Utilities and Services	Alt 1: No Impact	None
	Alt 2: No Impact	None
	Alt 3: No Impact	None
Environmental Justice	Alt 1: No Impact	None
	Alt 2: No disproportionately high or adverse effect on minority or low-income populations is anticipated.	None
	Alt 3: No disproportionately high or adverse effect on minority or low-income populations is anticipated.	None
Historical and Cultural Resources	Alt 1: No Impact	None
	Alt 2: No Impacts	Same as Alt. 3
	Alt 3: No Impacts	During construction, ground disturbing activities would be monitored. Should human remains or historic or archaeological materials be discovered during construction, all ground-disturbing activities on the project site would cease and the coroner's office (in the case of human remains), FEMA and Indiana State Historic Preservation Office will be contacted immediately.

SECTION 4: CUMULATIVE IMACTS

According to CEQ regulations, cumulative impacts represent the "impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7)." In accordance with NEPA and to the extent reasonable and practical, this EA considered the combined effect of the Proposed Action Alternatives and other actions occurring or proposed in the vicinity of the proposed project site. No proposed or current actions by others were identified in the vicinity of the proposed project site; therefore, no cumulative impacts are anticipated.

SECTION 5: PUBLIC PARTICIPATION

FEMA is the lead Federal agency for conducting the NEPA compliance process for the proposed Posey Township Fire Station # 1 in the Posey Township, Clay County, Indiana. It is the goal of the lead agency to expedite the preparation and review of NEPA documents and to be responsive to the needs of the community and the purpose and need of the proposed action while meeting the intent of NEPA and complying with all NEPA provisions. Inter-agency reviews have been conducted in the form of agency consultation letters and the responses received from agencies. Applicable agency responses have been provided in Appendix C. The proposed project has been discussed at numerous Clay County Commissioner meetings and Posey Township Volunteer Fire Department meetings, all of which are open to the public and welcome public comments. The Posey Township Volunteer Fire Department will notify the public the availability of the draft EA through publication of a public notice in a local newspaper as required. FEMA will conduct a public comment period commencing on the initial date of publication of the public notice.

SECTION 6: MITIGATION MEASURES AND PERMITS

There are no proposed mitigation measures.

In accordance with applicable local, State, and Federal regulations, the applicant would be responsible for acquiring any necessary permits prior to commencing construction at the proposed project site. The following permits and approvals may be required prior to construction: a State building permit

SECTION 7: CONSULTANTS AND REFERENCES

The following agencies and organizations were consulted or were contacted to request project review during the preparation of this EA. Responses received to date are included in Appendix C.

1. U.S. Department of Interior-Fish and Wildlife Services
2. Indiana Department of Environmental Management (electronic on-line response; no paper-based reply; http://www.in.gov/idem.)
3. Indiana State Historic Preservation Office
4. Indiana State Department of Health
5. Natural Resources Conservation Service, State Conservationist
6. Indiana Department Of Natural Resources-Division of Water
7. Various Native American Tribes

References:

U.S. Census Bureau. 2000b. American Fact Finder. http://factfinder.census.gov.

Stats Indiana. http://www.stats.indiana.edu.

U.S. Department of Agriculture (USDA), Natural Resources Conservation Service. 2009. http://websoilsurvey.nrcs.usda.gov.

U.S. Fish and Wildlife Service (USFWS). 2009. http://www.fws.gov/midwest/endangered/section7/sppranges/wisc-cty.html.

Clay County Hazard Mitigation Plan; Clay County Courthouse, Brazil, Indiana

U.S. Geological Survey- Indiana. http://www.igs.indiana.edu

Clay County Historical Society and Museum; Brazil, Indiana

Indiana Department of Environmental Management- Air Quality Monitoring. http://www.in.gov/idem/4652.

Indiana DNR Endangered, Threatened and Rare Species List; http://www.in.gov/dnr/naturepreserve/4725.htm.

SECTION 8: LIST OF PREPARERS

Preparation and quality control review of the draft and final EA:

Matthew Reed, Grant Administrator; Project Director; and Community Leader; Reed Consulting